

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT NEW YORK

CHARON COINS, LLC,

Plaintiff,

v.

SONEA GRIFFITHS,

Defendant.

Civil Action No. 7:21-cv-2777

**MEMORANDUM OF LAW IN SUPPORT OF
PLAINTIFF'S MOTION TO ATTACH DEFENDANT'S
BANK ACCOUNTS OR FOR A PRELIMINARY INJUNCTION**

EXHIBIT E

From: [Steve Oster](#)
To: [Jackson Kerr](#)
Cc: [Lewis Tesser](#)
Subject: Re: Charon Coins, LLC v. Sonea Griffiths - 21-cv-02777 - Adjournment
Date: Tuesday, May 11, 2021 11:08:43 AM

Hi Jackson,

Ordinarily, I would gladly extend the courtesy. I need to discuss with the plaintiff.

Given the underlying facts, we are concerned about secretion of funds. If your client will agree not to move any funds (crypto or otherwise), we can probably work it out.

This case is pretty straightforward: Ms. Griffiths purchased goods from my client. She currently has the goods and the purchase price. We are willing to rescind or accept performance.

Is there a time we can discuss?

Thank you.

Regards,

Steven M. Oster, Esq.
OSTER MCBRIDE PLLC
1320 19th St. NW, Suite 601
Washington, DC 20036
Office: 202.596.5291 Fax: 202.747.5862
Cell: 703.577.8785
Email: soster@ostermcbride.com

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From: Jackson Kerr <jkerr@tesserryan.com>
Sent: Tuesday, May 11, 2021 10:22:12 AM
To: Steve Oster <soster@ostermcbride.com>
Cc: Lewis Tesser <LTesser@tesserryan.com>
Subject: Charon Coins, LLC v. Sonea Griffiths - 21-cv-02777 - Adjournment

Hi Steve,

I just left a voicemail on your cell phone. As I explained in the voicemail, Tesser Ryan has been retained by Ms. Griffith to review the complaint filed by Charon Coins, LLC and provide an analysis of her options moving forward. We have not been retained to appear in the lawsuit.

In order for us to have time to perform our due diligence and provide Ms. Griffiths with the

proper analysis, we would ask for an adjournment of her time to answer for 30 days. If this alright with you, please let me know, and I can put a stip together to be signed and filed.

Please feel free to reach out if you have any questions or concerns.

Best,
Jackson

Jackson Kerr
Pending Admission to New York State Bar
Tesser, Ryan & Rochman, LLP
15 Fisher Lane, Suite 200
White Plains, New York 10603
Office: [914-368-4525](tel:914-368-4525) Fax: [914-368-4527](tel:914-368-4527)
Email: jkerr@tesserryan.com
Website: www.tesserryan.com

Offices also in New York, New York

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